

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

WHEATLEY, et al.,

Plaintiff,

vs.

SAFEHOME SECURITY INC.

Defendant.

§
§
§
§
§
§
§
§
§

Case No. 3:20-cv-03205-C

**PLAINTIFF'S SECOND AGREED MOTION FOR EXTENSION OF TIME TO
COMPLETE SETTLEMENT DOCUMENTATION
AND OBTAIN BANKRUPTCY COURT APPROVAL**

The parties notified the Court on February 1, 2022, pursuant to Docket number 17, that they had reach a tentative settlement in this matter. Pursuant to an order dated February 8, 2022, the Court administratively closed this case and instructed the parties to file closing documents within 30 days.

As previously reported to the Court, at the time of the parties' settlement, unbeknownst to Plaintiffs' Counsel, Plaintiff Patricia Wheatley and her husband had filed a bankruptcy matter. Upon learning said information, Plaintiffs' Counsel coordinated with the Bankruptcy Trustee to be appointed counsel by the Bankruptcy Court and to submit the proposed settlement for approval by the Bankruptcy Court. Based on the then anticipated timeframe necessary for all impacted bankruptcy parties to receive notice and the Bankruptcy Court to rule, Plaintiffs originally requested an additional 60 days for their tentative settlement with the Defendant to become completed.

However, since that request, the process has not gone as quickly as hoped. Although the Bankruptcy Court has approved Plaintiff's counsel to represent the Debtor/Plaintiff Wheatly, the needed changes to the settlement have not yet been received from the Trustee for the Parties' approval and to then be filed with the Bankruptcy Court. Accordingly, Plaintiff requests an additional 45 days to complete the settlement approval process in the Bankruptcy Court and then complete the settlement process in this matter.

Dated: May 13, 2022

Respectfully submitted,

/s/ Eric N. Roberson

Eric N. Roberson
State Bar No.: 00792803
Kilgore & Kilgore, PLLC
3109 Carlisle St.
Dallas, TX 75204
214.379.0817 Direct
214.969.9099
214.379.0843 Fax
ENR@KilgoreLaw.com
Attorney for Plaintiffs

CERTIFICATE OF CONFERENCE

The undersigned certifies that he has conferred with Defense Counsel and that this Motion is Agreed to by same.

/s/ Eric N. Roberson

Eric N. Roberson

CERTIFICATE OF SERVICE

The undersigned certifies that this document has been served on all counsel of record by ECF simultaneously with the electronic filing of the same.

/s/ Eric N. Roberson

Eric N. Roberson